

## KARPF, KARPF & CERUTTI, P.C.

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## **VIA ECF ONLY**

The Honorable Brian Martinotti United States District Court Clarkson S. Fisher Building & U.S. Courthouse 402 East State Street Trenton, NJ 08608

Re: Martha Hicks v. State of NJ DOC et al.

Docket No.: 3:16-cv-00927

Dear Judge Martinotti,

I represent Plaintiff in the above-referenced matter. I write on behalf of Plaintiff without objection from Defendants to respectfully request an extension of jurisdiction over the consummation of settlement in this matter through September 1, 2021. After the parties were able to reach an agreement to resolve the matter and execute the written Settlement Agreement, there was a delay due to a potential lien issue that has since been resolved, and are both currently working cooperatively to fully consummate the settlement. Plaintiff therefore respectfully requests an extension until September 1, 2021. Of course, should settlement be fully consummated prior to this time, the parties will file a stipulation of dismissal.

Should Your Honor require a more formal motion or additional information, please do not hesitate to contact me.

Respectfully submitted,

KARPF, KARPF & CERUTTI, P.C.

/s/ Andrew R. Olcese
Timothy S. Seiler, Esq.
Andrew R. Olcese, Esq.

cc: All Counsel of Record (via ECF)